

EXHIBIT D

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

-----X
SUPERCOM, INC.,

Plaintiffs,

-against-

911INET LLC, JOHN DOE CORPORATIONS 1-5,
D/B/A SPECIALTY LOCATION SERVICES,

Defendants.

-----X

**DEFENDANTS'
ANSWERS TO FIRST
INTERROGATORIES**

Index No. 20-CV-8228
(JSR)

Defendants, in response to Plaintiffs' First Set of Interrogatories, state, being first duly sworn, as follows:

ANSWERS TO INTERROGATORIES

INTERROGATORY NO. 1:

ANSWER:

Defendants object to this Interrogatory as violating Local Rule 33.3.

INTERROGATORY NO. 2:

ANSWER:

Phenix City, Alabama and by either wire transfer or check.

INTERROGATORY NO. 3:

ANSWER:

Javier Garcia.

INTERROGATORY NO. 4:

ANSWER:

No real property owned by Specialized Location Services.

INTERROGATORY NO. 5:

ANSWER:

No computer available that belonged to Specialized Location Services.

INTERROGATORY NO. 6:

ANSWER:

Defendants object to this Interrogatory as violating Local Rule 33.3.

INTERROGATORY NO. 7:

ANSWER:

Defendants object to this Interrogatory as violating Local Rule 33.3.

INTERROGATORY NO. 8:

ANSWER:

Defendants object to this Interrogatory as violating Local Rule 33.3.

INTERROGATORY NO. 9:

ANSWER:

Defendants object to this Interrogatory as violating Local Rule 33.3.

INTERROGATORY NO. 10:

ANSWER:

Defendants object to this Interrogatory as violating Local Rule 33.3.

INTERROGATORY NO. 11:

ANSWER:

Javier Garcia.

INTERROGATORY NO. 12:

ANSWER:

Defendants object to this Interrogatory as violating Local Rule 33.3.

INTERROGATORY NO. 13:

ANSWER:

Javier Garcia, CEO Specialized Location Services, 2010 to March, 2019.

INTERROGATORY NO. 14:

ANSWER:

Defendants object to this Interrogatory as violating Local Rule 33.3.

INTERROGATORY NO. 15:

ANSWER:

Defendants object to this Interrogatory as violating Local Rule 33.3.

INTERROGATORY NO. 16:

ANSWER:

Defendants object to this Interrogatory as violating Local Rule 33.3.

INTERROGATORY NO. 17:

ANSWER:

Javier Garca.

INTERROGATORY NO. 18:

ANSWER:

Javier Garcia.

INTERROGATORY NO. 19:

ANSWER:

jgarcia@slsgps.com.

INTERROGATORY NO. 20:

ANSWER:

Javier Garcia.

Dated: July 29, 2021

/s/ Javier Garcia
JAVIER GARCIA

AS TO OBJECTIONS:

Dated: Calverton, New York
July 29, 2021

/s/ Todd Wengrovsky
Todd Wengrovsky - TW4823
Law Offices of
Todd Wengrovsky, PLLC.
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